ORIGINAL

BEFORE THE

Federal Communications Commission

WASHINGTON, D.C.

IN THE MATTER OF:) MM Docket No.	HECEIVED
Amendment of 47 C.F.R. §73.202(b) Table of FM Allotments (Geneseo, Illinois and DeWitt, Iowa))) RM-)	AUG 2 0 1996 DERAL COMMISSION OFFICE OF SECRETARY
To: The Chief, Allocations Branch Policy and Rules Division	DOCKET FILE COPY ORIG	

PETITION FOR RULE MAKING

Comes now Connoisseur Communications of Quad Cities, L.P. ("Petitioner"), by Counsel, and pursuant to Section 1.401 of the Commission's Rules, hereby respectfully petitions the Commission to amend Section 73.202(b) of the Rules, FM Table of Allotments, as follows:

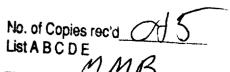
Community	Present	Proposed
Geneseo, Illinois	285A	
DeWitt, Iowa		285C3

In support whereof, the following is shown:

Background

1. Petitioner is the Licensee of Radio Stations WGEN (AM) and WGEN-FM, Geneseo, Illinois¹. Radio Station WGEN-FM is presently authorized to operate on Channel 285A. Petitioner seeks to have the Commission amend the FM Table of Allotments to permit an upgrade of the present allotment to a Class C3 facility, and to change WGEN-FM's community of license to DeWitt, Iowa.

¹Petitioner became the Licensee of WGEN AM & FM on July 31, 1996, pursuant to BAL-960528GM and BALH-960528GN.



Compliance With Allocation Rules

2. Attached hereto as *Exhibit 1*, is the Engineering Statement of Roy P. Stype, III of the Engineering firm of Carl E. Smith. As the attached Engineering Statement demonstrates, the proposed substitution of Channel 285C3 in DeWitt, Iowa for Channel 285A in Geneseo, Illinois will meet all of the spacing requirements set forth in 47 CFR §§73.207 and 73.210. Furthermore, this proposal falls under Sections 1.420(g) and 1.420(I) of the Commission's Rules because the proposed allotment of Channel 285C3 in DeWitt, Iowa is mutually exclusive with the present use of Channel 285A in Geneseo, Illinois. Accordingly, other expressions of interest need not be solicited or entertained by the Staff under current allocation policies.

Community Showing

- 3. DeWitt, Iowa is a community of sufficient size, identity, and independence to warrant an allotment of a local broadcast service under the Commission allocation policies. DeWitt is an incorporated city in Clinton County, Iowa. It had, as of the 1990 U.S. Census, a population of 4,514. A city-wide census taken in 1994 revealed that the city's population had increased to 4,963. The 1994 Rand McNally Road Atlas population figures for Clinton County were 51,040 persons.
- 4. The history of DeWitt dates back to 1841 when it was known as Vandenburg. It was at that time the Seat of Justice for Clinton County. In 1842, the Iowa Territorial Legislature changed the town's name to DeWitt. In 1858, DeWitt was officially incorporated. As an established historic city, DeWitt is deserving of a first aural service.
- 5. DeWitt has an elected mayor² and city council which are independent of Clinton County government. The city has its own community hospital, fire department, police department, water plant, trash disposal plant, library and community center. According to the

²The Hon. Leo Maynard is currently Mayor.

DeWitt Chamber of Commerce and Economic Development, there are over twenty-two major employers in DeWitt.³

- 6. In addition, DeWitt has a variety of retail stores, restaurants, service stations and banks. The city has a number of insurance companies, lawyers and a medical center which houses the offices of several physicians. There is an independent city school board which oversees a system of three elementary schools, one middle school, and one high school. Additionally, the community is served by several private preschools and a parochial school. The community also has ten houses of worship. DeWitt also has several service and community organizations. (See Exhibit 2)
- 7. Other Media. DeWitt is presently served by a bi-weekly newspaper, the DeWitt Observer, which is published in DeWitt. (See Exhibit 2).

Public Interest Showings

- 8. First Local Service to DeWitt, Iowa. As stated in the attached Engineering Statement, there are no other aural broadcast facilities in DeWitt. The proposed change in community would serve the new community and provide its first aural service. This new service will promote the Commission's goal of enhancing diversity of thought and opinion in the broadcast media, as well as Congress's charge to the Commission to ensure a fair, efficient and equitable distribution of radio services in the United States.⁴.
- 9. Maximization of Broadcast Facilities. Furthermore, under Commission policies, the proposed substitution and upgrade would constitute a preferential arrangement of allotments, and encourage the maximization of broadcast facilities. See generally, Modification of FM and TV Authorizations to Specify a New Community of License, 4 FCC Rcd 4870 (1989)

³See Exhibit 2, attached hereto.

⁴⁴⁷ U.S.C. §307(b)

("Change of Community R&O"), (recon. granted in part, 5 FCC Rcd 7094 (1990)) and Modification of FM and TV Stations Licenses, 49 FR 34007 (August 28, 1984, at \$13).

10. Significant Coverage Gains vs. Minimal Losses. The proposed reallotment to Channel 285C3 will realize a significant net gain in service coverage area versus loss of service. With the upgrade, the net gain in population would be 196,097 versus a net loss of 12,744.⁵ The net gain in area is 2,963 square KM versus 765 square km.⁶ Accordingly, the instant proposal is in the public interest because it maximizes the use of the channel allotted.

The Proposal is Consistent with the Commission's Community Change Policies

Although DeWitt is near the Davenport-Rock Island-Moline Iowa-Illinois urbanized area, the proposed allotment is not subject to the criteria set forth in RKO General (KFRC), 5 FCC Rcd 3222 (1990) or Faye and Richard Tuck, 3 FCC Rcd 5374 (1988). Under the recent decisions of Walterboro and Ridgeville, South Carolina, 1996 FCC Lexis 608, MM 93-169 (1996) and Headland Alabama and Chattahoochee, Florida, 10 FCC Rcd 10352 (1995), stations seeking to relocate to a community near an urbanized area are required to address facts set forth in KFRC and Tuck only if the new allotment would place a 70 dBu (3.16 mV/m) signal over the urbanized area. As indicated in the attached Engineering Statement, the predicted 70 dBu contour for WGEN-FM would cover only 46.5% of the urbanized area and 38.1% of the population in that area-less than the 50% criteria established in Tuck. Thus, the instant

⁵ See Engineering Statement (Exhibit 1), Table 1.2.

⁶Id.

⁷See also Change of Community R&O, supra.

⁸In any event, analysis of the community information provided herein provides ample evidence that the community of DeWitt, Iowa has its own identity and is substantially independent of the urbanized area to the South.

proposal is in compliance with the Commission's Community Change Policies. Community Change R&O, supra.

DeWitt with its first local service, but it will not deprive Geneseo of its own local service. WGEN (AM), which would remain licensed to Geneseo. Moreover, not only would the community of Geneseo continue to enjoy local aural service from WGEN (AM), but it also has reception service from at least five or more full-time aural services. In fact, as shown in Figure 1.2 of the Engineering Statement, even after the proposed change in community of license from Geneseo to DeWitt, WGEN-FM would continue to provide primary (1 mV/m) service on Channel 285C3 to all of Geneseo, Illinois.

Statement of Interest in Channel

13. Petitioner hereby states that, should the Commission institute the requested Rule Making proceedings and ultimately adopt the amendment to the FM Table of Allotments proposed herein, Petitioner will promptly file an application to modify the facilities of WGEN-FM to specify operation on Channel 285C3 and to change its community of license to DeWitt, Iowa.

⁹See Engineering Statement (Exhibit 1), p.3.

WHEREFORE, the above premises considered, Petitioner respectfully urges that the Commission Institute Rule Making proceedings, proposing to AMEND Section 73.202(b) of the Rules, FM Table of Allotments, as follows:

Community	Present	Proposed
Geneseo, Illinois	285A	
DeWitt, Iowa		285C3

Respectfully submitted,

CONNOISSEUR COMMUNICATIONS OF QUAD CITIES, L.P.

David M. Hunsaker

у:____

John C. Trent

Its Attorneys

August 20, 1996

Law Offices

PUTBRESE, HUNSAKER & TRENT, P.C.
100 Carpenter Drive, Suite 100
P.O. Box 217
Sterling VA 20167-0217
(703) 437-8400

EXHIBIT No. 1 ENGINEERING STATEMENT

ENGINEERING STATEMENT IN SUPPORT OF PETITION FOR RULEMAKING

CHANNEL 285C3 - DEWITT, IA

Connoisseur Communications of Quad Cities, L.P. Geneseo, IL

August 1, 1996

Prepared for: Mr. Jeff Warshaw

Connoisseur Communications

136 Main Street Westport, CT 06880

CARL E. SMITH CONSULTING ENGINEERS

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Roy P. Stype, III

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Table 1.1 - Proposed WGEN-FM City Grade Coverage of Urbanized Areas

Fig. 1.2 - Present and Proposed 1 mV/m Contours

Table 1.2 - Present and Proposed Area and Population

CABI E SMITH CONSULTING ENGINEERS

ENGINEERING AFFIDAVIT

State of Ohio)
) ss
County of Summit)

Roy P. Stype, III, being duly sworn, deposes and states that he is a graduate Electrical Engineer, a qualified and experienced Communications Consulting Engineer whose works are a matter of record with the Federal Communications Commission and that he is a member of the Firm of "Carl E. Smith Consulting Engineers" located at 2324 North Cleveland-Massillon Road in the Township of Bath, County of Summit, State of Ohio, and that the Firm has been retained by Connoisseur Communications of Quad Cities, L.P., to prepare the attached "Engineering Statement In Support Of Petition For Rulemaking - Channel 285C3 - DeWitt, IA."

The deponent states that the Exhibit was prepared by him or under his direction and is true of his own knowledge, except as to statements made on information and belief and as to such statements, he believes them to be true.

Roy P. Stype, III

Subscribed and sworn to before me on August 1, 1996.

Notary Public

/SEAL/

SHERI LYNN KURTZ, Notary Public Residence Summit County State Wide Jurisdiction, Ohit My Commission Expires June 14, 2008

ENGINEERING STATEMENT

This engineering exhibit is prepared on behalf of Connoisseur Communications of Quad Cities, L.P., licensee of Radio Station WGEN-FM - Geneseo, Illinois. It supports a petition to amend the FM Table of Allotments to upgrade WGEN-FM to a Class C3 facility and change its community of license to DeWitt, Iowa. The data contained in this exhibit shows that it is possible to substitute Channel 285C3 in DeWitt, Iowa, for Channel 285A in Geneseo, Illinois, for use by WGEN-FM.

The geographic coordinates for DeWitt are:

NL - 41° 49' 30" WL - 90° 32' 20"

This places DeWitt within Zone II, as defined by Section 73.205(c) of the FCC Rules. Accordingly, as outlined in Section 73.210(a) of the FCC Rules, the allotment of a Class C3 channel to DeWitt is permitted. The studies contained in this exhibit were conducted from a site 14.2 kilometers south-southeast of DeWitt. The geographic coordinates of this site are:

NL - 41° 42' 50" WL - 90° 27' 20"

This site also falls within Zone II, permitting the operation of a Class C3 facility from this site.

Table 1.0 is an FM allocation study for Channel 285C3 from the site described above. An examination of this table shows that operation on Channel 285C3 from this site would be short spaced to the present operation of WGEN-FM on Channel 285A. This short spacing will not pose any problems since this channel will be deleted if Channel 285C3 is allotted to DeWitt, as proposed herein. Furthermore, under the pro-

C	RL E	. Smith	CONSULTING	ENGINEERS	
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visions of Sections 1.420(g) and 1.420(i) of the FCC Rules, this conflict with the existing operation of WGEN-FM will permit the license of WGEN-FM to be modified to specify operation on Channel 285C3 in DeWitt, regardless of other expressions of interest which might be received. Pursuant to the rounding provisions of Section 73.208(c)(8) of the FCC Rules, the 141.54 kilometer spacing to WXRX - Belvidere, Illinois, and the 141.55 kilometer spacing to WXCL - Pekin, Illinois, are considered to comply with the required spacing of 142 kilometers.

Figure 1.1 is a map exhibit showing the predicted 3.16 mV/m (city grade) contour for the site specified above for Channel 285C3 in DeWitt. This contour was projected assuming maximum Class C3 facilities of 25 kilowatts effective radiated power at 100 meters above average, assuming uniform terrain. As shown in this figure, it will be possible to provide city grade service to all of DeWitt on Channel 285C3 from a site which will meet all of the spacing requirements to other facilities requiring consideration.

Also shown in Figure 1.1 are the boundaries of the Davenport-Rock Island-Moline, IA-IL, urbanized area. As shown in this figure, the predicted 3.16 mV/m contour for the proposed facilities will cover a portion of this urbanized area. Table 1.1 is a tabulation of the area and population within this urbanized area which will receive 3.16 mV/m service from the proposed upgraded facilities. As shown in this table, The proposed facilities will provide 3.16 mV/m service to 46.5% of the area and 38.1% of the population of this urbanized area. Since this urbanized area coverage falls below the 50% threshold outlined in the Report and Order in MM Docket 91-25 (Headland, Alabama and Chattahoochee, Florida), no showing regarding the independence of DeWitt from this urbanized area is required.

It should be noted that DeWitt (population 4514¹) presently has no local radio service and is not located within an urbanized area. Thus, the proposal outlined herein would provide DeWitt with its first local service, advancing the FCC's allotment priorities. Furthermore, the deletion of Channel 285A would not deprive Geneseo (population 5990) of its only local service, as WGEN(AM) would remain licensed to Geneseo.

Figure 1.2 is a map exhibit showing the predicted 1 mV/m contour for Channel 285C3 in DeWitt for operation with maximum Class C3 facilities from the coordinates outlined above. This figure also shows the predicted 1 mV/m contour for the present WGEN-FM operating facilities. Both of these contours were projected assuming uniform terrain. Table 1.2 presents detailed data on the present and proposed populations and areas, as well as the loss and gain areas. It should be noted that the entire area encompassed by these contours, including the loss and gain areas, is well served, receiving five or more fulltime aural services.

In summary, Channel 285C3 can be allotted to DeWitt, Iowa, in place of the present allotment of Channel 285A to Geneseo, Illinois, to permit the WGEN-FM operating facilities to be upgraded.

¹All population data in this exhibit is extracted from the 1990 U. S. Census.

TABLE 1.0

FM ALLOCATION STUDY - CHANNEL 285C3 (104.9 MHz) - DEWITT, IA CONNOISSEUR COMMUNICATIONS OF QUAD CITIES, L.P. GENESEO, IL

STUDY COORDINATES: 41/42/50 90/27/20

STATION	LOCATION	CHANNEL	CLASS	SPACING (km)	REQUIRED SPACING* (km)	NOTES
KRNA	Iova City, IA	231	C1	115.07	24. 0	
WSSQ	Sterling, IL	232	A	63.80	12.0	
KRKN	Eldon, IA	282	сз	181.20	43.0	2
KDAT	Cedar Rapids, IA	283	Cl	110.70	76.0	
WLMD	Bushnell, IL	284	A	129.75	89.0	
WCFL	Morris, IL	284	В	168. 12	145. 0	
WGENFM	Geneseo, IL	285	A	34. 93	142.0	3, 11
WXRX	Belvidere, IL	285	A	141.54	142.0	
WXCL	Pekin, IL	285	A	141.55	142. 0	
KBOEFM	Oskaloosa, IA	285	C2	187.95	177.0	
WNFM	Reedsburg, WI	285	A	211.81	142.0	
WLXRFM	La Crosse, WI	285	A	237.12	142.0	
WGENFM	Quincy, IL	286	В	209. 27	145. 0	
WOJO	Evanston, IL	286	В	236. 29	145.0	
950705MC	Knoxville, IL	287	· A	78.43	42.0	7
950705MA	Knoxville, IL	287	A	89. 15	42.0	7
KLYV	Dubuque, IA	287	C2	89. 98	56.0	
ALLOTMENT	Knoxville, IL	287	A	90.64	42.0	12
950703MD	Knoxville, IL	287	A	92.18	42.0	7
KILJFM	Mount Pleasant, IA	288	СЗ	125.91	43.0	1

^{*} Required Spacing Per Section 73.207 of The FCC Rules

. - CHITH CONCULTING FNGINEERS -

TABLE 1.0 (cont'd)

FM ALLOCATION STUDY - CHANNEL 285C3 (104.9 MHz) - DEWITT, IA CONNOISSEUR COMMUNICATIONS OF QUAD CITIES, L.P. GENESEO, IL

Notes:

ces.	1 - Applied For Under Section 73.215	7 - Pending Application
	2 - Construction Permit	8 - Petition For Reconsideration
	3 - Channel Deletion Proposed	9 - Proposed Rulemaking
	4 - Move From This Channel Ordered	10 - Rulemaking Petition
	5 - Move to This Channel Ordered	11 - Short-Spaced
	6 - One Step Reference Site	12 - Vacant Allotment

TABLE 1.1

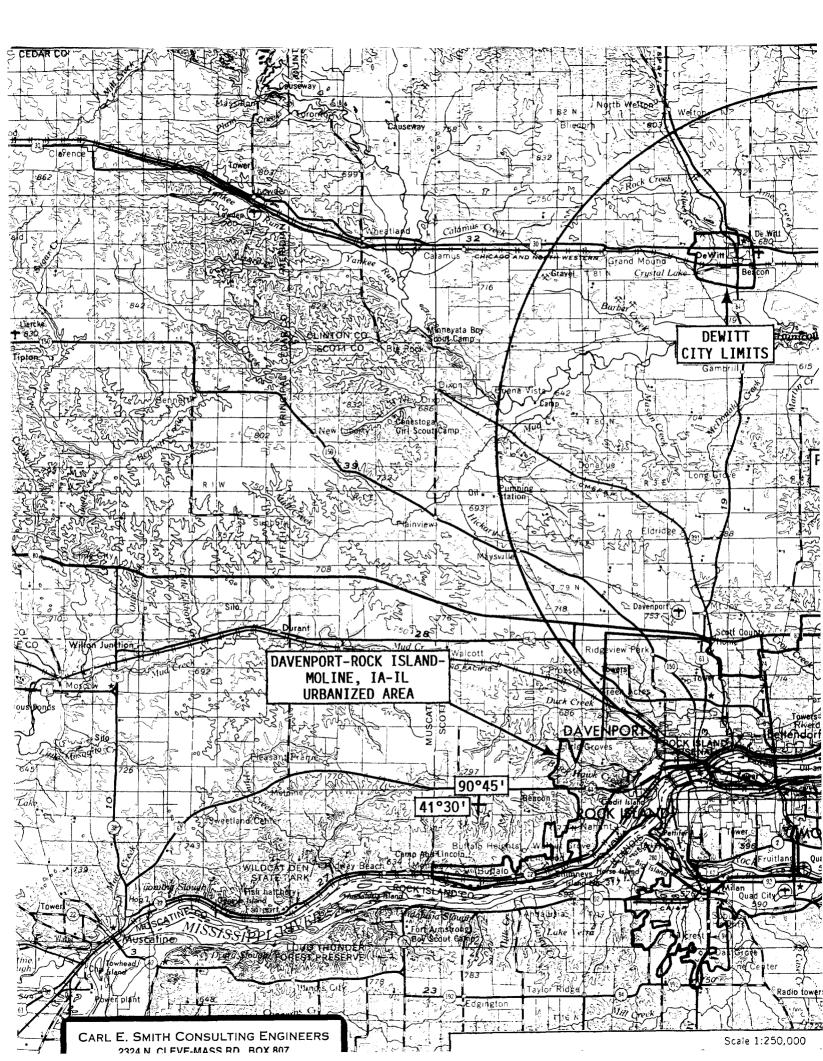
PROPOSED WGEN-FM CITY GRADE COVERAGE OF URBANIZED AREAS

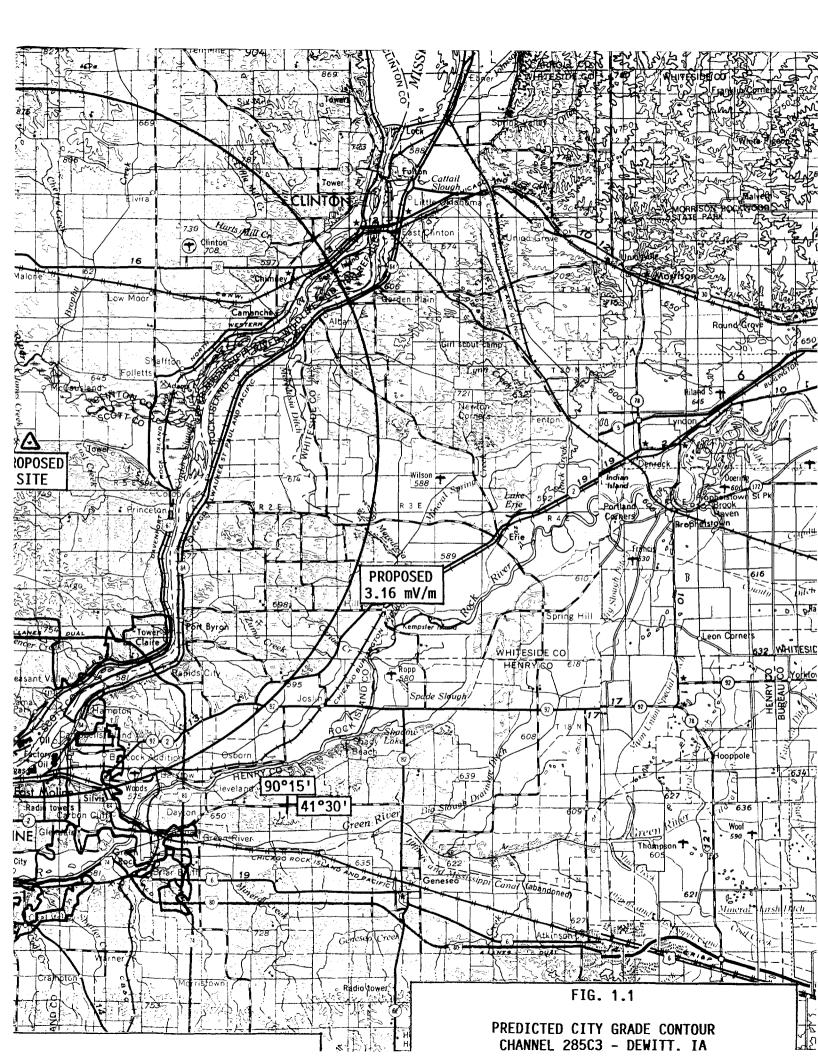
Connoisseur Communications of Quad Cities, L.P. Geneseo, IL

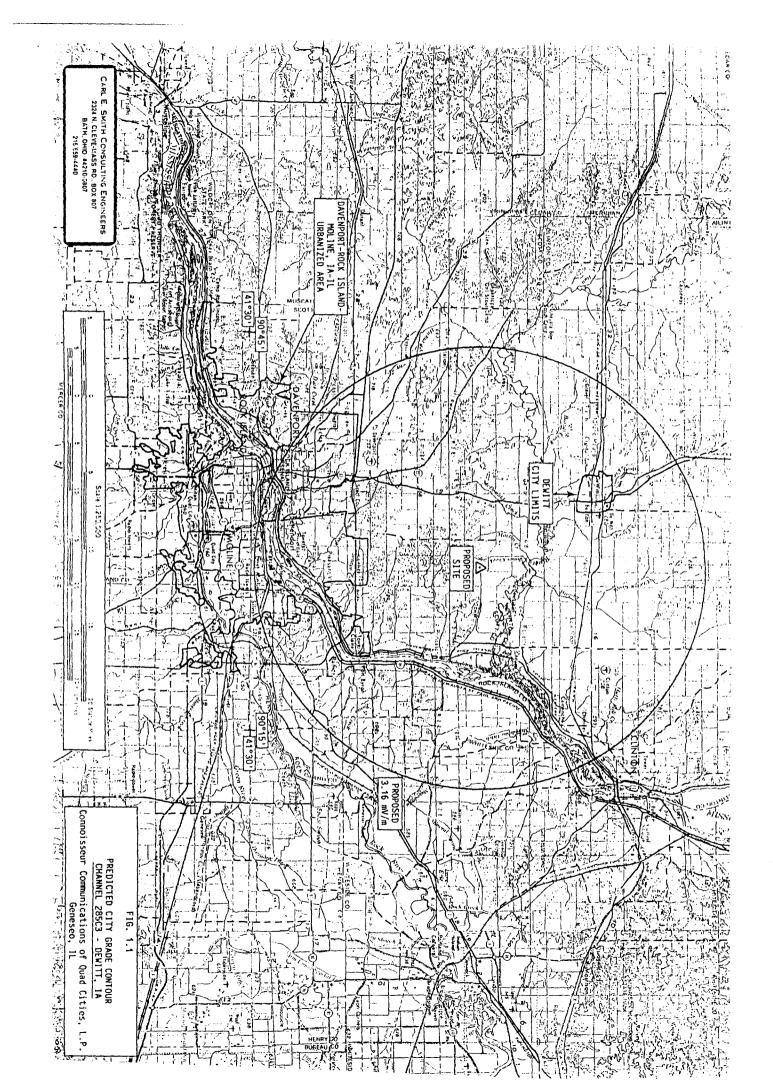
			Population	
	Ar	<u>ea</u>	(1990 U. S	3. Census)
<u>Urbanized Area</u>	(square km)	(Percent)	(Persons)	(Percent)
Davenport-Rock Island-Moline, IA-IL	189.0	46.5	100,521	38.1

Total area of Davenport-Rock Island-Moline, IA-IL, urbanized area = 406.8 square km.

Total population of Davenport-Rock Island-Moline, IA-IL, urbanized area = 264,018.







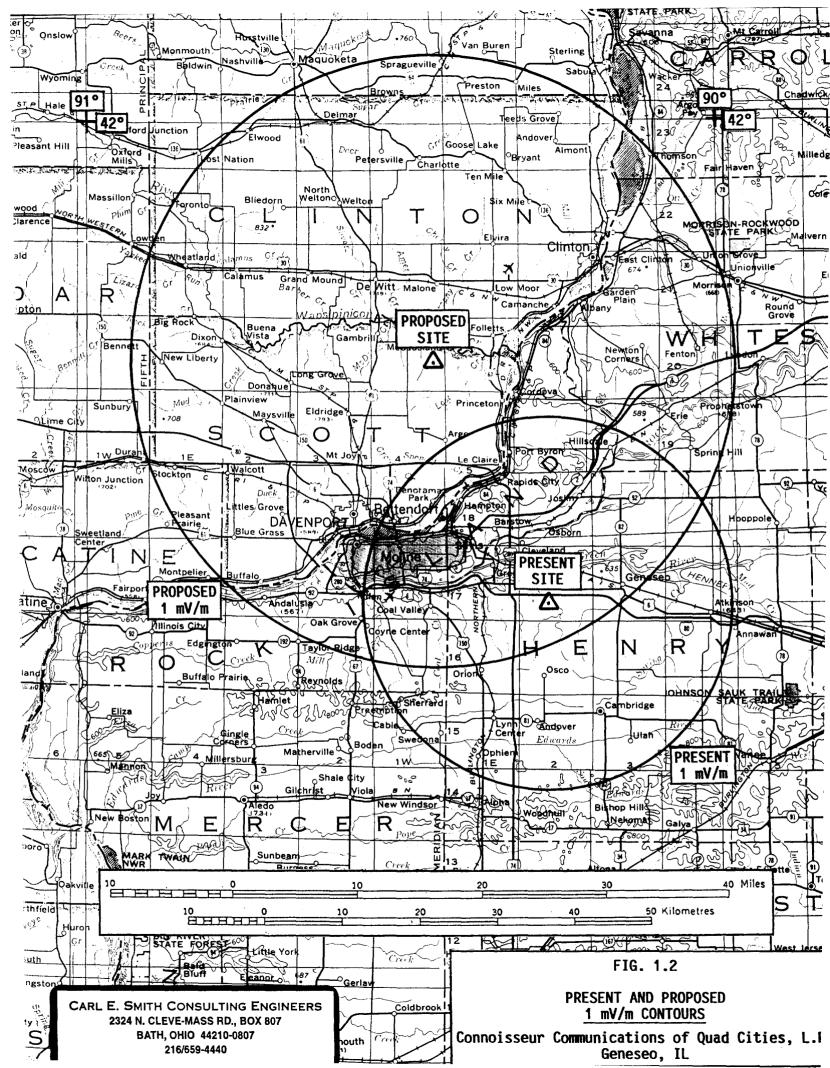


TABLE 1.2

PRESENT AND PROPOSED AREA AND POPULATION

Connoisseur Communications of Quad Cities, L.P. Geneseo, IL

	Area (Square Kilometers)	Population (1990 Census)
Present	1,840	179,592
Gain	3,728	208,841
Loss	765	12,744
Proposed	4,803	375,689
Net Gain	2,963	196,097

- CARL F SMITH CONSULTING ENGINEERS -

EXHIBIT No. 2 COMMUNITY SHOWING

MAJOR EMPLOYERS

Mayer: Les Maynard

Car-Freshner, Corp. Dan Estal, Manager 315 Industrial Street DeWitt, Iowa 52742 659-2360

Cargill Seeds Loren Zaruba, Manager 3645 Hwy. 30 DeWitt, Iowa 52742 522-2521

Central Community Schools
Dr. Charles Norland, Interim
923 4th Avenue E.
DeWitt, Iowa 52742
659-0700

Custom-Pak
Jeff Anderson, Manager
1401 Lake Street
DeWitt, Iowa 52742
659-2100

DeWitt Bank & Trust Company Dick Kelly, CEO 815 6th Avenue DeWitt, Iowa 52742 659-3211

DeWitt Community Hospital Jim Christensen, CEO 1118 11th Street DeWitt, Iowa 52742 659-3241

Ennis Business Forms Bill Lange, Manager 304 3st Avenue E. DeWitt, Iowa 52742 659-5011

Fauser Development Jack Anderson, Owner 225 S. 6th Avenue DeWitt, Iowa 52742 659-3191 1st Central State Bank Norlan Hinke, CEO 914 6st Avenue DeWitt, Iowa 52742 659-3141

Guardian Industries, Inc. George Longo, Plant Manager 300 South 5th Avenue DeWitt, Iowa 52742 659-2012

Iowa Mutual Immrance Co. Carman Smith, President 509 5th Street DeWitt, Iowa 52742 659-3231

JRB Company, Inc. Mike Welch, Manager 224 Industrial Street DeWitt, Icwa 52742 659-9155

Magnaflux, Inc. Joe Tabor, Manager 306 Industrial Street DeWitt, Iowa 52742 659-8143

Mississippi Engineering
Bob Fuller/Randy Tunnell
504 Smith Street
Grand Mound, Iowa 52751
847-2900

Satellite Screens, Inc. Brad Schnittjer, Owner 221 East 2nd Street DeWitt, Iowa 52742 659-3799

Schwan's Distribution Ron Berg, Manager 318 Industrial Street DeWitt, Iowa 52742 659-5975 Seventh Avenue
Bill Bauman, Plant Manager
219 East Industrial Street
DeWitt, Iowa 52742
659-2081

Signode, ITW Tim Dunlavy, Manager 223 Industrial Street DeWitt, Iowa 52742 659-8651

Waterbed Creations Charles Gregoire, Owner 101 East Street Grand Mound, Iowa 52751 847-1000

Wellington Sears, Inc.
Mike Shepard, Manager
112 3rd Avenue E.
DeWitt, Iowa 52742
659-3251

Wendling Quarries, Inc. Tony Manatt, Manager 2628 225th Street DeWitt, Iowa 52742 659-9181

Witte Ready Mix Concrete Mark Witte, Manager 901 Westwood Drive DeWitt, Iowa 52742 659-3412

Poet-It* Fax Note 7671	Date 7/4/96 pages 1
To Laura Northen	From TUCIL
Co./Dept.	co. Dewitt Chaine
Phone #	Phone # 659-8500
Fax 1 319 324 1819	Fax 659- 2410

DEWITT COMMUNITY ORGANIZATIONS

American Assn. University Women
Jill Fabian
315 2nd Avenue
DeWitt, Iowa 52742
659-2918

Eugene McManus Post #238 Legion Building, 704 9th Street DeWitt, Iowa 52742 659-9967 Contact: George Raes Welton, Iowa 52774 659-5738

American Legion Auxiliary Twilah Raes Welton, Iowa 52774 659-5738

Boy Scouts/Girl Scouts of America William and Jolene Ketelsen 815 11th Avenue DeWitt, Iowa 52742 659-9442

Cub Scouts
Vern Dirksen, Cubmaster
723 9th Avenue
DeWitt, Iowa 52742
659-9959

Business and Professional Women Midge Twigg 137 8th Street DeWitt, Iowa 52742 659-3573

Central Community PTO
Ruth Schroeder
2175 220th Avenue
Grand Mound, Iowa 52751
847-1495

Central Community Historical Society 628 6th Avenue
DeWitt, Iowa 52742
659-9717
Contact: Ann Soenksen
2503 340th Avenue
DeWitt, Iowa 52742
659-3686

CI-ED Club Gloria Malooly 1121 6th Avenue DeWitt, Iowa 52742 659-3662

Clinton County Cattlemen's Assn. Gaylon Truelson 3543 275th Street Camanche, Iowa 52730 522-2380

Clinton County Cattlewomen's Assn.
Carol Truelson
3543 275th Street
Camanche, Iowa 52730
522-2380

Clinton County Crimestoppers Gary Clark 1613 Springdale Drive Clinton, Iowa 52732

Clinton/Jackson County Dairy Assn.
Alfred L. Fier, President
RR 4
Maquoketa, Iowa 52060
652-2072

Clinton County Interagency (CCIA)
Alice Schnepel
3151 245th Street
DeWitt, Iowa 52742
659-9494

Clinton County Pork Producers Bob Kohnert 2018 200th Aveneue Grand Mound, Iowa 52751 246-2714

Clinton County Shepherd's Assa. Gary Braet (Yogi) 308 Clinton Street Calamus, Iowa 52729 246-2668

Clinton County Sportsman's Club RR 1, DeWitt, Iowa 52742 659-5415 Contact: Greg Oldsen 2866 270th Street, DeWitt, Iowa 659-9238

DeWitt Chamber of Commerce DeWitt Development Company Jane Hadden, Executive Director 524 10th Street, PO Box 153 DeWitt, Iowa 52742 659-8500

DeWitt Community Center 514 10th Street DeWitt, Iowa 52742 For Reservations Call City Hall 659-3811

DeWitt Hospital Auxiliary President 1118 11th Street DeWitt, Iowa 52742 659-3241

DeWitt Junior Women Sally Lindsey

DeWitt, Iowa 52742 659-9799

DeWitt Lioness
Nancy Aiken
714 2nd Street
DeWitt, Iowa 52742
Contact at: 659-3251

DeWitt Nite Lions
Dr. J. Scott Siegel, President
623 3rd Street
DeWitt, Iowa 52742
659-8290

DeWitt Noon Lions Howard Ehrler, President 1001 12th Street DeWitt, Iowa 52742 659-5449

DeWitt Theater Board
John Peavey
1402 Royal Oak Ct., DeWitt, Iowa
659-9652

DeWitt Volunteer Fire Department Fire Station Located on 9th Street 659-3000; Report Fire call 911 John Durken, Chief 659-5757

Golden Star Chapter 283/Eastern Star Karen Fatchett, Worthy Major 815 12th Avenue DeWitt, Iowa 52742 659-5697

4-H Clubs Connie Schnoor 1527 11th Street DeWitt, Iowa 52742 659-3733

Friends of the Library Dr. Merv Hassebrock 2382 267 Avenue DeWitt, Iowa 52742 659-8251